

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST
LITIGATION*

Case No. 20-cv-1319 (JRT/JFD)

This Document Relates To:

All Cases

**[PROPOSED] ORDER REGARDING JOINT STIPULATION
TO MODIFY SCHEDULING ORDER**

Pursuant to the Joint Stipulation to Modify Scheduling Order (ECF No. 609), entered into by the Parties, and finding that good cause has been shown,

IT IS HEREBY ORDERED that the Scheduling Order (ECF No. 571) is MODIFIED as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Modification</u>
First phase search term proposals begin with proposals by producing parties	[No date certain; <i>see</i> Search Methodology Order (ECF No. 572) (“SMO”)]	August 15, 2022 for all RFPs resolved prior to Plaintiffs’ Motion to Compel (ECF No. 591) (“Resolved RFPs”). 14 days after a ruling on the Motion to Compel for these RFP disputes.
Requesting parties provide proposed revisions to producing parties’ search terms	[Per SMO, 14 days after producing parties’ proposals]	14 days after producing parties’ proposals
Producing party supports its objections to proposed revised search terms	[Per SMO, 14 days after requesting parties’ proposals]	14 days after requesting parties’ proposals

Conclude meet and confers and file motion practice over search terms, if any	[No current deadline]	October 4, 2022
Rolling Productions to commence	4/18/2022	<p>All Parties have already started producing available documents. To advance discovery while certain disputes and negotiations continue, Defendants further agree to the following interim deadlines:</p> <p>By August 12, 2022: Defendants to begin additional rolling productions of responsive, nonprivileged materials that were produced in related state and federal government cases (“Investigative Materials”) on or before July 29, 2022 (“pre-August”).</p> <p>By August 23, 2022: Defendants to have produced the substantial corpus of the pre-August Investigative Materials.</p> <p>By September 26, 2022: Defendants to produce the remaining pre-August Investigative Materials.</p> <p>By October 25, 2022: Any additional Investigative Materials produced in the related cases between July 29, 2022 and September 2, 2022 to be produced by Defendants in this matter.</p> <p>Investigative Materials produced in the related cases after September 2, 2022 will be produced in this matter on a rolling basis.</p>

Productions for 5 Priority Custodians to be completed	August 15, 2022	December 15, 2022 for Resolved RFPs (subject to the understanding that if the parties bring motion practice over certain search terms, this deadline will not apply to the disputed search terms)
Structured data productions complete	September 1, 2022	December 1, 2022 Structured data subject to the Motion to Compel need not be produced until 40 days after a ruling on the Motion to Compel, or March 1, 2023, whichever is later.
Document productions substantially complete	November 1, 2022	February 23, 2023
Motions to amend the pleadings	December 1, 2022	April 5, 2023
Class certification motions and Plfs. serve class cert. expert reports	May 1, 2023	August 16, 2023
Defs.' class cert. oppositions, Defs.' class cert. Daubert motions, and Defs. serve class cert. expert reports	July 3, 2023	October 18, 2023
Plfs.' class cert. replies, Plfs.' class-cert.-related Daubert motions, Plfs.' opps. to Defs.' Daubert motions, and Plfs. serve any class cert. expert rebuttal reports	September 1, 2023	December 21, 2023
Fact discovery completed	October 2, 2023	February 2, 2024
Defs.' opps. to Plfs.' Daubert motions, and Defs.' replies ISO Defs.' Daubert motions	October 13, 2023	February 15, 2024
Plfs.' replies ISO Plfs.' Daubert motions	November 13, 2023	March 15, 2024

Deadlines related to the service of back-up materials and depositions of class certification experts shall remain as set forth in the Scheduling Order. All other deadlines in the Scheduling Order that are set by reference to other dates, rather than as a date certain, shall similarly remain as set forth in the Scheduling Order.

IT IS SO ORDERED.

Date: _____

JOHN F. DOCHERTY
United States Magistrate Judge